

Eric M. Creizman

Direct T 212.209.4358 F 212.409.8385

ECreizman@attlp.com



MEMO ENDORSED

October 21, 2020

By ECF

The Honorable Kenneth M. Karas
United States District Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Sholem Steinberg*, 7:18-CR-614 (KMK) (SDNY)

Dear Judge Karas:

I represent Sholem Steinberg in the above-referenced case. I am writing to respectfully request a five-day adjournment of the deadline to serve Mr. Steinberg's sentencing submission from Thursday, October 22, 2020 to Tuesday, October 27, 2020.

We are requesting this modest adjournment of three business days because Mr. Steinberg's father-in-law passed away shortly after the Jewish holidays, and his wife's shiva ended yesterday, October 20, 2020. Given that the sentencing submission will principally focus on Mr. Steinberg's personal and family history and circumstances, it is important that we are afforded time to adequately discuss our submission with him in order to ensure that our sentencing presentation is accurate and complete, and that it is satisfactory to Mr. Steinberg. Due to the Jewish holidays and the mourning period for Mr. Steinberg's wife, we have not had sufficient time to do that.

Because I do not anticipate that our discussion of the general offense conduct (or even Mr. Steinberg's specific conduct) will raise substantially unique issues of fact or law that will not be addressed in the submissions of his co-defendants, I do not believe the government will be prejudiced in any way by this short adjournment of the deadline to submit Mr. Steinberg's sentencing memorandum. Of course, to the extent the government requires additional time

Hon. Kenneth M. Karas

October 21, 2020

Page 2

beyond November 12, 2020 to respond to our submission, we would certainly consent to any such adjournment of its deadline.

Shortly after speaking with Mr. and Mrs. Steinberg last night, I sent an email to counsel for the government to advise them of our request for an adjournment on the grounds described above, and sought the government's position on that request. As of 2:10 p.m., we have not received any response from government counsel, so I am unable to report to the Court whether or not the government objects to this application.

I thank the Court for its consideration in this matter.

Respectfully,

Granted.

/s/ Eric M. Creizman

So Ordered.

Eric M. Creizman



10/21/20

cc: Assistant United States Attorneys Michael Maimin and Vladislav Vainberg